

ALEX G. TSE (CABN 152348)
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROOZBEH IRAVANI,

Defendant.

Case No. CR 17-340 WHA

STIPULATION AND [PROPOSED]
ORDER TO CONTINUE
SENTENCING HEARING

On this matter, the parties are next scheduled to appear before the Court on May 29, 2018, for the defendant's sentencing hearing. The parties, however, agree that a continuance of that hearing is appropriate, and the parties jointly ask that the Court continue the hearing until July 3, 2018, during the Court's regular criminal calendar.

Several factors compel this request. First, government counsel has been transferred to the U.S. Attorney's Office's San Jose branch and added to a San Jose criminal trial with a pre-trial conference already scheduled for May 29, 2018. Second, the Probation Officer assigned to this case recently received victim-impact statements and restitution requests, and she noted that a continuance would benefit her in the preparation of the defendant's presentence investigation report, or PSR. The proposed

1 continuance and alternative sentencing date will thus resolve a conflict for government counsel and help
2 the Probation Officer—and consequently the Court—gather the facts necessary for a fair sentencing
3 hearing.

4 For these reasons, the parties agree and jointly request that the Court continue the defendant's
5 sentencing hearing until July 3, 2018, during the Court's regular criminal calendar.

6 SO STIPULATED.

7
8 May 9, 2018
Date

/s/
RANDALL LEONARD
Assistant U.S. Attorney

10
11 May 9, 2018
Date

/s/
DOUGLAS RAPPAPORT
Attorney for Roozbeh Iravani

13 For the reasons stated in the stipulation, and good cause having been shown, IT IS SO
14 ORDERED.

15
16 _____
Date

William H. Alsup
United States District Judge